

STIPULATION CONCERNING CLASS CERTIFICATION

1. Stipulation as to Class Certification. The parties consent to certification of the Class defined below with respect to the Class Claims specified below.

a. Class Definition: All participants and beneficiaries of the UnitedHealth Group 401(k) Savings Plan (“Plan”) who, through the Plan, invested in the Wells Fargo Target Fund Suite (comprising first the Wells Fargo Target CIT E3 funds and then the Wells Fargo DJ Target N funds for target date vintages 2010, 2015, 2020, 2025, 2030, 2035, 2040, 2045, 2050, 2055, and 2060) from April 23, 2015, through the date of judgment (the “Class Period”), excluding any individuals who served during the

Class Period as members of UnitedHealth Group Incorporated's board of directors; any individuals who served during the Class Period as members of the UnitedHealth Group Retirement Plan's Investment Review Committee, the UnitedHealth Group Employee Benefits Plans Investment Committee, or the UnitedHealth Group Employee Benefits Plans Administrative Committee; and any individual who served during the Class Period as UnitedHealth Group's Executive Vice President of Human Capital.

- b. Class Claims: (1) breach of the duty of prudence set forth in the Employee Retirement Income Security Act of 1974 ("ERISA") based on Defendants' alleged failure to remove the Wells Fargo Target Fund Suite from the UnitedHealth Group 401(k) Savings Plan during the Class Period, and (2) breach of the duty of prudence set forth in ERISA based on Defendants' alleged failure during the Class Period to monitor the individuals who possessed delegated authority to remove the Wells Fargo Target Fund Suite from the UnitedHealth Group 401(k) Savings Plan.

2. Requirements for Class Certification. The requirements for class certification set forth in Fed. R. Civ. P. 23(a) and 23(b)(1)(A)&(B) are satisfied with respect to the Class Claims, as further detailed below.

- a. The numerosity requirement in Fed. R. Civ. P. 23(a)(1) is satisfied, as the Class contains thousands of members.
- b. The commonality requirement in Fed. R. Civ. P. 23(a)(2) is satisfied, as

Plaintiff's Complaint at ¶ 126 alleges multiple questions that are common to the claims of all Class members.

- c. The typicality requirement in Fed. R. Civ. P. 23(a)(3) is satisfied, as Plaintiff and the Class members all participated in the UnitedHealth Group 401(k) Savings Plan and invested in the Wells Fargo Target Fund Suite (or were beneficiaries of such participants), and the Class Claims are based on alleged violations of ERISA that do not vary between Plaintiff and the Class members.
 - d. Plaintiff avers that the adequacy requirement in Fed. R. Civ. P. 23(a)(4) is satisfied. Plaintiff Kim Snyder has selected qualified counsel to represent her and, by this Stipulation, affirms her commitment to serving as class representative.
 - e. Class certification is appropriate under Fed. R. Civ. P. 23(b)(1)(A), as prosecuting separate actions by Class members would create a risk of inconsistent adjudications with respect to individual Class members that would establish incompatible standards of conduct for the Plan fiduciaries.
 - f. Class certification is appropriate under Fed. R. Civ. P. 23(b)(1)(B), as adjudication of Plaintiff's claims as a practical matter would be dispositive of the interests of the other Class members.
3. Class Counsel: Attorneys David Sanford, Charles H. Field, Alexandra Harwin, Kevin Sharp, Leigh Anne St. Charles, Johan Conrod, and Sanford Heisler Sharp,

- LLP are qualified to serve as Class Counsel pursuant to Fed. R. Civ. P. 23(g)(1).
4. Notice Not Required: The provision of notice is not necessary, as the Class is certified pursuant to Fed. R. Civ. P. 23(b)(1).
5. Request for Entry of Proposed Order. Based on the foregoing, the parties consent to, and Plaintiff moves for, the Court's entry of the Proposed Order submitted herewith.

Dated: January 11, 2022

Respectfully Submitted,

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